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January 18, 2024

BY ECF & FEDERAL EXPRESS

Hon. Robert Kirsch, U.S.D.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 4E
Trenton, NJ 08608

Re: *Bodyguard Productions Inc., et al. v. RCN Telecom Services, LLC, et al.*
Civil Action No. 3:21-15310 (RK) (TJB)

Screen Media Ventures LLC v. RCN Telecom Services, LLC, et al.
Civil Action No. 3:23-23356 (MAS) (TJB)

Dear Judge Kirsch:

Our firm, along with our co-counsel Foley & Lardner LLP and Culpepper IP LLC, represents Plaintiff Screen Media Ventures LLC, and Foley & Lardner LLP and Culpepper IP LLC represent all remaining Plaintiffs. We enclose for Your Honor's consideration courtesy copies of the following documents, which have been electronically filed with the Clerk of the Court in connection with Plaintiffs' Motion to Consolidate *Screen Media Ventures LLC v. RCN Telecom Services, LLC, et al.*, Civil Action No. 3:23-23356 (MAS) (TJB), with *Bodyguard Productions Inc., et al. v. RCN Telecom Services, LLC, et al.*, Civil Action No. 3:21-15310 (RK) (TJB), for all purposes including trial:¹

1. Notice of Motion to Consolidate;
2. Brief in support of Motion to Consolidate;
3. Proposed form of Order; and

¹ Plaintiffs have also filed a letter addressed to Chief Judge Bumb requesting consolidation and/or reassignment of the *Screen Media Ventures* matter, *see* L.Civ.R. 40.1, but have filed the within motion to consolidate in order to preserve their rights if Chief Judge Bumb would prefer the issues to be heard by Your Honor first.

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4. Certificate of Service.

We thank the Court for its consideration in this matter. Naturally, if the Court has any questions, we would be pleased to respond at the Court's convenience.

Respectfully submitted,

/s Jakob B. Halpern

Jakob B. Halpern

/jbh

cc: Hon. Michael A. Shipp, U.S.D.J. (by ECF)
Counsel of Record (by ECF & email)